

**BRUNO W. TARABICHI**, CA State Bar No. 215129  
[bruno@legalforcelaw.com](mailto:bruno@legalforcelaw.com)

**HEATHER R. NORTON**, CA State Bar No. 257014  
[heather@legalforcelaw.com](mailto:heather@legalforcelaw.com)

**SCOTT J. ALLEN**, CA State Bar No. 178925  
[scott@legalforcelaw.com](mailto:scott@legalforcelaw.com)

**LEGALFORCE RAJ ABHYANKER, P.C.**  
 1580 W. El Camino Real, Suite 13  
 Mountain View, California 94040  
 Telephone: 650.965.8731  
 Facsimile: 650.989.2131

Attorneys for Defendant and Counterclaimant  
 Raj Abhyanker

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

NEXTDOOR.COM, INC., a Delaware  
 corporation,

Plaintiff,

vs.

RAJ ABHYANKER, an individual,

Defendant.

Case No. 3:12-cv-05667-EMC

**STIPULATION AND [PROPOSED]  
 ORDER FOR VOLUNTARY DISMISSAL  
 WITH PREJUDICE OF DEFENDANT AND  
 COUNTERCLAIMANT RAJ  
 ABHYANKER'S COUNTERCLAIMS  
 AGAINST COUNTERDEFENDANTS  
 NEXTDOOR.COM, INC. AND PRAKASH  
 JANAKIRAMAN**

RAJ ABHYANKER, an individual

Counterclaimant,

vs.

NEXTDOOR.COM, INC., a Delaware  
 corporation; and PRAKASH  
 JANAKIRAMAN, an individual;

Counterdefendants.

Case Filed: November 5, 2012

Judge: Honorable Edward M. Chen

1 Plaintiffs/Counterdefendants Nextdoor.com, Inc. ("Nextdoor.com") and Prakash  
2 Janakiraman ("Janakiraman") and Defendant/Counterclaimant Raj Abhyanker ("Abhyanker"),  
3 through their counsel of record, hereby stipulate and agree, and request the Court to enter, the  
4 following Order resolving Abhyanker's counterclaims in this matter.

5 1. On December 5, 2013, Abhyanker filed a Second Amended Answer and  
6 Counterclaims [Dkt. No. 132] ("SACC"), asserting counterclaims for trade secret  
7 misappropriation against Nextdoor.com and Janakiraman, and trademark infringement,  
8 infringement of an unregistered mark, and California unfair competition against Nextdoor.com.

9 2. On May 8, 2014, Nextdoor.com and Abhyanker stipulated to a dismissal of  
10 Abhyanker's trademark infringement counterclaim, and to entry of judgment on Nextdoor.com's  
11 claim for declaratory judgment that it has established trademark rights, including priority of use,  
12 of the NEXTDOOR Mark in the field of online social networking [Dkt. 188].

13 3. Abhyanker, on behalf of himself and any entities he controls, now or in the future,  
14 wishes to dismiss with prejudice and forever release all remaining counterclaims against  
15 Nextdoor.com and Janakiraman.

16 4. Each party preserves the right to move for or oppose an award of attorneys' fees  
17 and costs with respect to the matters dismissed and adjudicated by this Order at an appropriate  
18 time in this action and to present any and all admissible evidence with respect to such a motion.

19 5. Nothing in this Stipulation shall be construed as an admission of liability or  
20 wrongdoing of any kind by any of the parties hereto.

1  
2  
3 Stipulated and agreed to this 13th day of June 2014.  
4

5 /s/ Bruno W. Tarabichi  
6 Bruno W. Tarabichi  
7 Heather R. Norton  
8 Scott J. Allen  
9 Attorneys for Defendant  
10 Raj Abhyanker  
11

12 /s/ Ilana Rubel  
13 FENWICK & WEST LLP  
14 Ilana Rubel  
15 Attorneys for Plaintiffs and  
16 Counterdefendants Nextdoor.com, Inc.  
17 and Prakash Janakiraman

18 ATTESTATION

19 Pursuant to Civil Local Rule 5-1(i)(3), I hereby attest that all signatories to this filing have  
20 provided their consent to this filing.

21 /s/ Bruno W. Tarabichi  
22 Bruno W. Tarabichi  
23  
24  
25  
26  
27  
28

**[PROPOSED] ORDER**

In accordance with the stipulation of the parties, and for good cause shown, the Court hereby orders, adjudges and decrees that:

1. Counterclaimant Raj Abhyanker's claim of trade secret misappropriation is hereby dismissed with prejudice.
2. Counterclaimant Raj Abhyanker's claims of trademark infringement, to the extent not already dismissed pursuant to the Court's Entry of Partial Dismissal, Dkt. 192, are hereby dismissed with prejudice.
3. Counterclaimant Raj Abhyanker's claim of California Unfair Competition is hereby dismissed with prejudice.

IT IS SO ORDERED.

ENTERED this \_\_\_\_\_ day of June, 2014.

---

HON. EDWARD M. CHEN  
UNITED STATES DISTRICT JUDGE

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28